

Serial No. 09/664,479
Art Unit No. 2684

REMARKS

Claims 1-2, 9-12 were pending in the patent application. By this Amendment, Applicants introduce new Claims 13-15. Applicants respectfully assert that the claim language is supported by the original Specification. Authorization is hereby given to charge Deposit Account 50-0510 for the introduction of three new independent claims.

The Examiner has rejected Claims 1-2 and 9-12 under 35 USC 102 as anticipated by the O'Neil patent. For the reasons set forth below, Applicants respectfully assert that all of the pending claims are patentable over the cited prior art.

The present application teaches and claims a network node device for automatically, dynamically, and selectively connecting one or more telephone wirelines to one or more wireless connections, with the aim of providing dynamic selective bridging of both incoming and outgoing calls to and from wireless devices based on unique identifying information, including privacy policies associated with the wireless devices to which the wireless connections are being

YOR920000632

-13-

Serial No. 09/664,479

Art Unit No. 2684

made. The invention comprises steps and means for performing the steps, by a network node comprising one or more connections to one or more telephone wirelines; one or more wireless signal generators supporting one or more wireless connections; at least one storage location for storing unique service information for each of a plurality of wireless devices; a processor for accessing the storage location and for generating call processing signals based on the stored unique information; an interconnection switch that makes and breaks one or more interconnections between the telephone wirelines and the respective wireless signal generators to connect one or more incoming calls to one or more of the plurality of wireless devices in response to the call processing signals; and a bridge that dynamically bridges signals from multiple wireless connections to one or more of the telephone wirelines for outgoing calls from one or more of the wireless devices in response to call processing signals generated by the processor based on stored unique information (Claims 1 and 14). The network node device may further include a verifier that verifies the validity of a request from a wireless device through a wireless connection for the bridging of signals (Claim 2),

YOR920000632

-14-

Serial No. 09/664,479
Art Unit No. 2684

and may further be adapted to dynamically and selectively connect signals from wireless devices based on both unique identifier and unique service information (Claims 9 and 10), and the device may be adapted to alter the connection of signals dynamically, during use after a wireless connection has already been made (Claims 11, 13 and 15) or may deny bridging (Claim 12).

Under the present invention, while multiple devices may share a telephone number, and the associated single wireline, the inventive network node and method allows selective connection across the different devices based on the unique information associated with the devices, such that multiple incoming calls to a single telephone number and/or outgoing calls can be connected between multiple different wireless devices and the wirelines even when the wireless devices share the same telephone number. Applicants respectfully assert that the O'Neil patent does not teach or suggest the invention as claimed.

The O'Neil patent is directed to a method and system for connecting telephone calls to multiple devices, wherein each device has its own telephone number (see: the Abstract, wherein O'Neil expressly teaches "at first unit having a

Serial No. 09/664,479
Art Unit No. 2684

first number and a second unit having a second number", as well as Col. 19, lines 43-51). Under the O'Neil system, a call to one telephone number associated with a single handset (wired or wireless) may result in ringing not only of the handset associated with that assigned telephone number, but also ringing at different handsets, each having a different telephone number. The O'Neil patent illustrates and describes several different embodiments of its system, using overlapping reference numerals (see: Figs. 1-3). Applicants respectfully assert that none of the O'Neil embodiments anticipates the claimed network node and method.

With specific reference to the claim language, the Examiner has analogized the network node device for dynamically and selectively connecting one or more telephone wirelines to one or more wireless connections by citing the O'Neil services node 30, against the claimed network node device. Applicants note that the O'Neil services node 30 is part of the PSTN in Fig. 1 and clearly does not comprise components as claimed. The services node 30 does not have one or more connections to one or more telephone wirelines; one or more wireless signal generators supporting one or more wireless connections to one or more wireless devices;

YOR920000632

-16-

Serial No. 09/664,479

Art Unit No. 2684

at least one storage location for storing unique information for each of a plurality of wireless devices; a processor for accessing said at least one storage location and for generating call processing signals based on said stored unique information; an interconnection switch that makes and breaks one or more interconnections between the telephone wirelines and the respective wireless signal generators to connect one or more incoming calls arriving on said telephone wirelines to one or more of the plurality of wireless devices in response to said call processing signals generated by said processor; and a bridge that dynamically bridges signals from multiple wireless connections for outgoing calls from one or more of said plurality of wireless devices to one or more of the telephone wirelines in response to said call processing signals generated by said processor based on stored unique information. Similarly, the services node of Fig. 2 and the one illustrated in Fig. 3 are part of the wireless network and are not comprised of the claimed components.

The Examiner cites the O'Neil components 20a-20f as wirelines; however, reference numerals 20a, etc. refer to telephones (see: Figs. 1-3 and Col. 10, line 50) which are

YOR920000632

-17-

Serial No. 09/664,479

Art Unit No. 2684

connected to subscriber lines (Col. 10, lines 47-48). The Examiner also cites reference numeral 34 against the wireless connections in the claim. However, reference numeral 34 refers to a handset, and not a connection. The Examiner next cites reference numeral 138 of Fig. 4b against the claimed "one or more wireless connections to one or more telephone wirelines". Applicants note that reference numeral 138 refers to a step to "connect to wireline unit". A step in a process flow does not anticipate a claimed wireless connection. Applicants further assert that there are no wireline connections that are part of services node 30.

The Examiner has cited reference numeral 154 of Fig. 4b and the teachings found at Col. 12, lines 24-49 against the claims "one or more wireless signal generators supporting one or more wireless connections to one or more wireless devices." Applicants note that reference numeral 154 refers to a method step to "connect to wireless unit". Again, a step in a process flow does not anticipate a claimed wireless signal generator. Applicants further assert that there are no wireless signal generators which are part of services node 30. O'Neil does have antennas 38 and 39, but

YOR920000632

-18-

Serial No. 09/664,479

Art Unit No. 2684

the antennas are not part of the services node. With respect to the teachings found at Col. 12, lines 24-49, the cited passage details that, in response to a trigger event associated with a subscriber wireline, a packet is sent to the service control point (SCP 24 of Fig. 2) to query the database for what service is subscribed to, after which a packet goes from the SCP to the switch instructing how to process the call and the switch generates call signaling messages. Nothing in the cited passages teaches or suggests a wireless signal generator as part of a services node.

With respect to the claim feature of "at least one storage location for storing unique information, comprising at least unique service information, for each wireless device", the Examiner has cited the HLR and the teachings at Col. 14, lines 34-57. The cited passage states that the wireless network switch 36 includes a register 40 (HLR) for checking "activity and availability of any particular wireless unit" (Col. 14, lines 48-58 and Col. 17, lines 39-42 and lines 47-49) and that "this inquiry is based on the wireless number of the wireless unit" (Col. 17, lines 49-51). The claims specify that the unique information is service information and not a telephone number, particularly

YOR920000632

-19-

Serial No. 09/664,479
Art Unit No. 2684

since Applicants have expressly stated that the present invention is applicable even when multiple wireless devices share the same telephone number. Moreover, the HLR is not part of the services node.

With respect to the claimed processor for accessing the storage location and for generating call processing signals based on stored unique information, Applicants note that the Examiner has not cited any teachings of a processor. Rather, the Examiner has stated that a processor is inherent for programming and communications routing instructions, with citation of the teachings from Col. 28, lines 39-60. Applicants respectfully disagree with the inherency conclusion. With regard to the O'Neil switch being "programmed to respond...to check with the HLR" (Col. 28, lines 45-47), Applicants note that O'Neil could be referring to a signal relay with dedicated lines (e.g., "if signal input on line A, then switch output to HLR"). Such circuit design components do not require a processor. Similarly, the O'Neil statement that "HLR is programmed to provide the switch with communications routing instructions...to route to the services node" does not require a processor. Again, the "programming" could be a simple relay switch.

YOR920000632

-20-

Serial No. 09/664,479
Art Unit No. 2684

Applicants respectfully assert that inherency must necessarily flow from the prior art (*The Toro Co. v. Deere & Co.*, 355 F.3d 1313, 1320 (Fed. Cir. 2004)). Since non-processor alternatives could perform the stated tasks, inherency of a processor in the O'Neil system, where no processor is taught, simply cannot be maintained.

With regard to the interconnection switch, the Examiner has cited Col. 31, lines 15-65. The cited passage teaches steps for "telecommunication extension service", wherein a call to one telephone number may result in ringing on one handset (wired or wireless) which has that first telephone number as well as ringing on at least one other handset which has a different telephone number. The cited passage details steps, but does not teach an interconnection switch, let alone an interconnection switch which is part of the services node.

Finally, with respect to the claimed bridge, the Examiner has cited the teachings found at Col. 20, lines 30-46, Col. 21, lines 25-35, and Col. 28, lines 39-66. The passage from Col. 20 describes receipt of a communication from the end office to the services node. There is nothing in the passage about a bridge, let alone about a bridge that

YOR920000632

-21-

Serial No. 09/664,479
Art Unit No. 2684

is part of a services node and which bridges signals from multiple wireless connections for outgoing calls from one or more wireless devices to one or more telephone wirelines in response to call processing signals generated by a processor based on stored unique information. O'Neil only details relaying of incoming calls and does not teach or suggest a bridge, a bridge in a services node, bridging or signals for outgoing calls, or bridging of signals based on stored unique information.

The cited teachings at Col. 21, lines 25-35 state that a services node connects a call to a port on a three-port conference bridge, so that more than one handset, each with a different telephone number, may be connected to one call. O'Neil does not, however, teach or illustrate the three-port conference bridge. O'Neil does not teach or suggest that a three-port conference bridge is part of the services node. O'Neil does not teach or suggest that bridging is done in response to call processing signals generated by a processor. Finally, the cited teachings from Col. 28, lines 39-66 state that the services node checks the HLR to determine if a wireless handset is available. There is no mention of a bridge, or of a bridge that bridges signals for

YOR920000632

-22-

Serial No. 09/664,479

Art Unit No. 2684

outgoing calls, or of bridge which responds to call processing signals generated by a processor based on stored unique services information.

It is well established under U.S. Patent Law that, for a reference to anticipate claim language under 35 USC 102, that reference must teach each and every claim feature. Since the O'Neil patent does not teach a network node device for dynamically, and selectively connecting one or more telephone wirelines to one or more wireless connections comprising: one or more connections to one or more telephone wirelines; one or more wireless signal generators supporting one or more wireless connections; at least one storage location for storing unique service information for each of a plurality of wireless devices; a processor for accessing the storage location and for generating call processing signals based on the stored unique information; an interconnection switch that makes and breaks one or more interconnections between the telephone wirelines and the respective wireless signal generators to connect one or more incoming calls to one or more of the plurality of wireless devices in response to the call processing signals; and a bridge that dynamically bridges signals from multiple

YOR920000632

-23-

Serial No. 09/664,479

Art Unit No. 2684

wireless connections to one or more of the telephone wirelines for outgoing calls from one or more of the wireless devices in response to call processing signals generated by the processor based on stored unique information, it cannot be maintained that the O'Neil patent anticipates the invention as claimed. Accordingly, Applicants believe that the anticipation rejections must be withdrawn.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration of the amended claim language in light of the remarks, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,

R. E. Chapman

By: Anne Vachon Dougherty
Anne Vachon Dougherty
Registration No. 30,374
Tel. (914) 962-5910

YOR920000632

-24-